

Thrift Institutions Advisory Council  
March 3, 2006

Comments on:

Concentrations in Commercial Real Estate Lending, Sound Risk Management Practices  
(Docket No. OP-1248)

Interagency Guidance on Non-traditional Mortgage Products (Docket No. OP-1246)

Credit Risk Management Guidance for Home Equity Lending

At a meeting of the Thrift Institutions Advisory Council with the Board of Governors on March 3, 2006, George Jeffrey Records, Jr., Chairman and Chief Executive Officer, MidFirst Bank, Oklahoma City, Oklahoma, presented the Council's views on three recent interagency guidances concerning real estate lending. Council members are concerned that the guidances are overly prescriptive and may inhibit appropriate types of lending. Council members appreciate the agencies' attempts to limit risk; however, it is in the best interests of all parties to avoid excessive regulatory burdens and restrictions that would hamper the ability of insured institutions to offer the widest array of products available to serve all of their customers appropriately.